

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Mohamed Elsherif,)	Civil No. 0:18-cv-02998-DWF-KMM
)	
Plaintiff,)	PLAINTIFF'S AMENDED
v.)	MOTIONS TO COMPEL RULE
Mayo Clinic and Robert J. Spinner,)	30(b)(6) DEPOSITION AND TO
)	TAKE DEFENDANTS'
Defendants.)	DEPOSITIONS OUT OF TIME
)	DUE TO COVID-19

Pursuant to Federal Rules of Civil Procedure, Rules 26, 30 and 37, Plaintiff Mohamed Elsherif (“Dr. Elsherif”) respectfully moves this Court for an Order granting his Motion to Compel the Rule 30(b)(6) Deposition of Defendant Mayo Clinic.

Plaintiff also moves, pursuant to Federal Rules of Civil Procedure, Rule 16(b)(4) and the Court’s March 13, 2020 Order,

https://www.mnd.uscourts.gov/sites/mnd/files/2020-0313_COVID-19-AdminOrder.pdf, for an Order granting his Motion to Take Defendants’ Depositions Out of Time due to Covid-19.

These Motions are based upon Plaintiff’s Memorandum of Law and any associated documents to be filed, and the arguments of counsel, and upon all of the files, records and proceedings in this legal action.

Respectfully Submitted,

RIMAS LAW FIRM, PLLC

Dated: March 23, 2020

By: s/ Vytas Rimas

Vytas M. Rimas (#182539)

5101 Thimsen Ave., Suite 204
Minnetonka, MN 55345
952-476-4000 Office
vytas@rimaslawfirm.com
ATTORNEY FOR PLAINTIFF
MOHAMED ELSHERIF